

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Gulf South Pipeline Co LP  
Gulf South Pipeline Co LP - Napoleonville Compressor Station  
Napoleonville Assumption Parish, Louisiana  
Agency Interest Number: 8157  
Activity Number: PER20090001  
Proposed Permit Number: 0200-00012-V4**

**I. APPLICANT**

**Company:**

Gulf South Pipeline Co LP  
PO Box 1039  
Napoleonville, Louisiana 70390-8288

**Facility:**

Gulf South Pipeline Co LP - Napoleonville Compressor Station  
808 Hwy 401  
Napoleonville, Assumption Parish, Louisiana  
Approximate UTM coordinates are 687.24 kilometer East and 3309.99 kilometer North.

**II. FACILITY AND CURRENT PERMIT STATUS**

Napoleonville Compressor Station, a natural gas transmission facility began operation prior to 1976. It is currently operating under Permit No. 0200-00012-V3, issued August 13, 2008.

The facility submitted timely a renewal application.

**III. PROPOSED PROJECT/PERMIT INFORMATION**

**Application**

A permit application was submitted by Gulf South Pipeline Co LP on August 25, 2009 requesting a Part 70 operating permit renewal/modification.

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**Project**

Natural gas is transported to Napoleonville Compressor Station via pipeline. Condensate is separated from the natural gas and sent to the 8,820 gallon storage tank. The condensate is periodically loaded into a tank truck and shipped off-site. Two natural gas fired reciprocating engines and one turbine are used to transport the natural gas by pipeline from the compressor station to commerce.

Emissions of combustion products are from firing natural gas in the turbine and the engine. VOCs would be generated during loading operations from the condensate tank to tank trucks, flashing at the condensate tank, the blowdown vent, area releases of natural gas, and fugitive emissions from equipment components. Additionally, minimal fugitive particulate emissions will be generated by traveling on unpaved roads.

**Proposed Permit**

A permit application and Emission Inventory Questionnaire were submitted by Gulf South Pipeline Co LP on August 25, 2009 requesting a renewal and modification of the Part 70 Operating Permit.

The application do reflect updates to some stack dimensions (high and diameter) and updates for heat inputs, exhaust flow rates and exhaust velocities.

Gulf South is not proposing any changes to the facility as part of this application.

**Permitted Air Emissions**

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	2.89	2.89	-
SO <sub>2</sub>	1.11	1.11	-
NO <sub>x</sub>	173.01	173.01	-
CO	111.49	111.49	-
VOC *	35.19	38.08	+2.89

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VOC\* LAC 33:III. Chapter 51 Toxic Air Pollutants (TAP)

Pollutant	Before	After	Change
2,2,4-Trimethylpentane	0.034	0.035	+0.001
Acetaldehyde	0.616	0.616	-
Acrolein	0.371	0.371	-
Benzene	0.079	0.088	+0.009
Ethylbenzene	0.012	0.012	-
Formaldehyde	2.377	2.377	-
n-Hexane	0.709	0.827	+0.118
Toluene	0.099	0.105	+0.006
Xylene	0.047	0.049	+0.002
Total	4.344	4.480	+0.136

#### **IV REGULATORY ANALYSIS**

The facility was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations. Prevention of Significant Deterioration (PSD), New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

##### **Louisiana Air Quality Regulations and NSPS**

The applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirement Section of the draft permit. Similarly, monitoring, Reporting, and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided to the Facility Specific Requirements Section of the draft permit.

NSPS Subpart JJJJ for IC Engines does not apply because they were constructed prior to June 12, 2006 and have not modified since then.

##### **Prevention of Significant Deterioration/Nonattainment Review**

This facility is located in an attainment area and is not a major source as defined in PSD rules. Therefore, PSD and Non-attainment New Source Review do not apply.

##### **MACT Requirements**

This facility is classified as a minor source of Toxic Air Pollutants (TAP). MACT is not required.

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**Air Quality Analysis**

Emissions associated with the proposed renewal were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
-	-	-	-

**General Condition XVII Activities**

No general condition XVII activities are included in the permit.

**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

**V. PERMIT SHIELD**

This permit does not include any permit shield.

**VI. PERIODIC MONITORING**

To ensure compliance with the permit limit, emission from the compressor engines and turbine are periodically monitored or tested.

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## **VII. GLOSSARY**

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H<sub>2</sub>S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO<sub>x</sub>) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM<sub>10</sub> – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

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Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO<sub>2</sub>) – An oxide of sulfur.

Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.